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**VIA E-FILE**

The Honorable Joan M. Azrack  
United States District Court  
Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Michael Chavez v. Charles Baratta LLC et al.*  
Civil Action No: 2:21-CV-06771-JMA-JMW  
Unopposed Letter Motion to Extend Time to Respond to Complaint

Dear Judge Azrack:

This law firm was recently retained to represent Defendant Charles Baratta LLC ("Defendant") in the above-captioned lawsuit. Defendant writes to respectfully request a 30-day extension of time to move, answer, or otherwise respond to the Complaint up to and including February 2, 2022. The deadline is presently January 3, 2022.

The reason for this request is that Defendant recently retained us to represent it in this dispute and, as such, we require additional time to investigate the Complaint's allegations and prepare an appropriate response. This is Defendant's first request for an extension of this deadline. Plaintiff does not oppose the relief requested herein. This request affects no other scheduled deadline or court appearance. Accordingly, Defendant respectfully requests that its deadline to move, answer or otherwise respond to the Complaint be extended from January 3, 2022 to February 2, 2022.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP

/s/ Edward C. Wipper

Edward C. Wipper